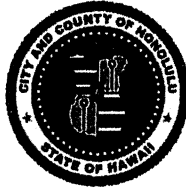


# CITY AND COUNTY OF HONOLULU

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KIRK CALDWELL  
MAYOR



KATHY K. SOKUGAWA  
ACTING DIRECTOR

EUGENE H. TAKAHASHI  
DEPUTY DIRECTOR

2020/SUP-1(TB)

December 2, 2020

## MEMORANDUM

TO: Arthur D. Challacombe, Chair  
and Members of the Planning Commission

FROM: Kathy K. Sokugawa, Acting Director *Kathy Sokugawa*  
Department of Planning and Permitting

SUBJECT: Special Use Permit (SUP) Application File No. 2020/SUP-1  
State of Hawaii, Department of Education for  
Olomana School/Olomana Youth Center  
42-470 Kalanianaʻole Highway, Kailua, Oahu  
Tax Map Key 4-2-006: 002 (portion)

Attached for your appropriate action is our report and recommendation for conditional approval of a 2.516-acre SUP application to remove Olomana School/Olomana Youth Center's nonconforming status with respect to the State Land Use Law, Chapter 205, Hawaii Revised Statutes, and allow structural and program improvements including: 1) Construction of three portable/modular classroom facilities, a restroom facility, and related access improvements; 2) Reconstruction/relocation of a modular trailer; and 3) Alterations and renovations to the interior of the P-1/P-2 Culinary Arts building. The Department of Planning and Permitting recommends conditions of approval relating to the submittal of a metes and bounds description of the Petition Area, building permits for two of the existing buildings, an exterior lighting plan, protection of historic and cultural resources, and standard conditions.

The SUP application can be downloaded from: <https://bit.ly/3kLubZk>

Should you have any questions, please contact Thomas Blair, of our staff at [Thomas.Blair@honolulu.gov](mailto:Thomas.Blair@honolulu.gov).

Enclosures

cc: Department of Education  
Wilson Okamoto Corporation  
John Sakaguchi

DEPT OF PLANNING  
AND PERMITTING  
CITY AND COUNTY OF HONOLULU

20 DEC -3 AM 23

RECEIVED

DEPARTMENT OF PLANNING AND PERMITTING  
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAII

IN THE MATTER OF THE APPLICATION )  
 )  
 OF )  
 )  
 STATE OF HAWAII )  
 DEPARTMENT OF EDUCATION )  
 )  
 FOR A SPECIAL USE PERMIT )  
\_\_\_\_\_)

FILE NO. 2020/SUP-1

FINDINGS OF FACT, CONCLUSIONS  
OF LAW, AND RECOMMENDATION

**I. APPLICATION**

A. Basic Information.

PETITIONER:	State of Hawaii, Department of Education
OWNER:	State of Hawaii
LOCATION:	42-470 Kalanianaʻole Highway, Kailua, Oahu (Exhibit 1)
TAX MAP KEY:	4-2-006: 002 (portion)
AREA OF SPECIAL USE:	Approximately 2.516 acres (Petition Area) portion of the 437-acre parcel (Exhibit 2)
RECORDATION:	Land Court System
STATE LAND USE DISTRICT:	Agricultural District (Exhibit 3)
KOOLAU POKO SUSTAINABLE COMMUNITIES PLAN:	Outside the Community Growth Boundary. Designated for institutional and preservation uses.
EXISTING ZONING:	AG-2 General Agricultural District (Exhibit 4)
LAND STUDY BUREAU RATING:	"D" Productivity Rating (Exhibit 5)
EXISTING USE:	Olomana School/Olomana Youth Center

**SURROUNDING LAND USE:**

Moana Cottage, a partially collapsed historic structure, is to the south; forest immediately surrounds the east, north, and west; and a historic gymnasium is to the east. Further out, Hawaii Youth Correctional Facility (HYCF) is 1,000 feet to the northwest; open space and forest to the south (Exhibit 6)

- B. Proposal. The Hawaii Department of Education (DOE) is applying for a Special Use Permit (SUP) to: 1) Bring the existing Olomana School/Olomana Youth Center and its facilities into compliance with respect to the State Land Use Law, Chapter 205, Hawaii Revised Statutes (HRS); and 2) Permit improvements to the school to facilitate the potential enrollment of an additional 90 students.

In addition to recognizing the non-conforming school and its facilities, there are three separate and distinct proposed improvements related to the SUP. The three proposed improvements are: 1) Construction of three portable/modular classroom facilities, a restroom facility, and related access improvements; 2) Reconstruction/relocation of a modular trailer; and 3) Alterations and renovations to the interior of the P-1/P-2 Culinary Arts building.

The addition of three modular classrooms and a restroom facility, would allow the enrollment to expand by 90 to a total of 200 students. Four new teacher positions would also be added.

- C. Background. According to the application, the use of the property for educational uses dates back to 1924 when the entire 437 acres of the property was set aside for the Girl's Industrial School. Four of the five existing buildings located outside of the Petition Area, but on the 437-acre property, were constructed prior to the Girl's Industrial School opening in 1927. The five historic buildings include: the Hookipa Cottage, the Superintendent House, Hill Top Cottage, the partially collapsed Moana Cottage, and the gymnasium which was built in 1938.

In the early 1950s, the Olomana School/Olomana Youth Center was established at its current location. The Girl's Industrial School and boys school became the HYCF in 1962. These buildings are outside of the Petition Area, but within the affected parcel (Tax Map Key (TMK), 4-2-006: 002). In 1976, the first six modular trailer classrooms and a portable restroom were donated to Olomana School/Olomana Youth Center and relocated to the Petition Area. Table 1 contains a summary of the building permits issued for the uses to be recognized under the SUP, and the building permits that are still needed for existing facilities or proposed improvements. Table 1 also includes the proposed improvements to the school use which are in bold.

Chapter 205, HRS, Land Use Commission (LUC) was adopted in 1961 and the LUC Rules of Practice and Procedures", the predecessor to Hawaii Administrative Rules (HAR), Title 15, Chapter 15, was adopted in 1962. Thus, the Olomana School/Olomana Youth Center was established and operating for about 10 years prior to the adoption of Chapter 205, HRS.

**Table 1 – Existing and Proposed Uses and Structures within the Petition Area**

Status	Facility	Existing Use	Proposed Use	Area (sf)	Building Permit No./ App. No.	Year Added
Existing	P-3	Graphics-Math		896	1921, 118705, 270590	1976
Existing	P-4	Art		896	1917, 270591	1976
Existing	P-5	Science		896	1918, 270591	1976
Existing	P-6	Middle School		924	1916, 354641	1976
Existing	P-7	Physical Education		896	2040	1977
Existing	P-8	English-Math		896	2041	1977
Existing	P-9	Social Sciences-Math		896	2042	1977
Existing	P-10	Science		812	A1996-05-0538	1996
Existing	P-11	English		812	-	-
Existing	P-12	Administration Office		896	118706, 354642, 584448	2004
Existing	P-13	Library		960	584448, 710507, 843519	2012
Existing	PT 046	Toilet/Restroom		336	1915	1976
Existing		Wood Shop		1,910	-	-
Existing		Technology		1,340	A2019-07-0967	2019
Existing		Auto Mechanics		334	156893	1979
Existing		Counselor Offices		2,040	118706	1979
Existing		Modular Classroom Trailer	Modular Classroom Trailer	672	843520	2019
Relocate		Agricultural/ Greenhouse	Agricultural/ Greenhouse		-	-
Rehab	P-1	Class-Dining Room	Culinary Arts	896	1919, 270589 A2019-02-1083 (P-2)	1976
Rehab	P-2	Class-Dining Room		924	1920, 118704, 270589, 354318	1976
Proposed			Modular Classroom	900		
Proposed			Modular Classroom	900		
Proposed			Modular Classroom	900		
Proposed			Restroom Facility	575		
Rehab/ Relocate		Teen Care Trailer	Teen Care Trailer	530	A2019-07-0968	
Proposed			Covered Outdoor Use	1,230		

Olomana School/Olomana Youth Center is a DOE public school. The Olomana Youth Center, is the name of the campus affected by this SUP. This report will use the full name of the facility as it appears on the SUP application.

Enrollment at the school is voluntary, with students or their families choosing to enroll at the school to have access to the programs in the various trades offered (carpentry, automotive, arts/graphics, and culinary), for remedial classes, or for disciplinary reasons. The school has an enrollment of approximately 110 students that are in grades 7 to 12. Approximately 70 percent are boys and 30 percent are girls. Attendance averages roughly 80 percent daily. There are about 30 staff members at the school. The proposed improvements could allow for up to a total of 200 students.

Olomana School/Olomana Youth Center conducts classes in facilities owned by the HYCF. Staff positions include teachers, counselors, administrators, and other staff. The school operates under the traditional school calendar, with classes from August to May with a summer session. Like all DOE schools, the Olomana School/Olomana Youth Center has allowed only a limited number of students back on campus at any given time due to the COVID-19 pandemic. Beginning in 2021, more students will be welcomed back to campus, pending no major modifications to Emergency Declarations as of the writing of this report.

The Petition Area includes two areas, the school campus, which contains all of the buildings associated with this SUP, and an overflow parking area. The two areas are bisected by an access road, Road "A," which connects the Petition Area, and buildings outside of the SUP, to Kalanianaʻole Highway. The Petition Area is approximately 2.516 acres (the 2.206-acre campus and 0.310-acre overflow parking area).

The primary parking area is currently unstriped. According to the SUP application, the paved area can accommodate 18 vehicles, per the City and County of Honolulu's Land Use Ordinance (LUO) requirements, with additional parking on areas that are currently unpaved. There is a secondary parking area, opposite Road "A" that is included in the Petition Area that serves as overflow parking.

The Petition Area is located in the State Land Use Agricultural District (Exhibit 3). Section 205-6, HRS, allows the "county planning commission to permit certain unusual and reasonable uses within the agricultural and rural districts other than those for which the district is classified." The purpose of the Petitioner seeking a SUP, is to permit the proposed school facilities as unusual and reasonable uses within the agricultural district.

The Petition Area is zoned AG-2 General Agricultural District (Exhibit 4). Pursuant to Chapter 21, Revised Ordinances of Honolulu (ROH), the LUO, the DOE schools are considered public uses and structures. According to Table 21-3, Master Use Table of the LUO, public uses and structures are permitted in AG-2 district areas.

- D. Other Permits and Approvals. Building permit approvals for the P-1/P-2 Culinary Arts project are currently being reviewed. The building permits for expansion of the school with three modular portable classrooms have yet to be submitted to the Department of Planning and Permitting (DPP) for review. If it is determined that the proposed

facilities, the Wood Shop, or the P-11 Building, do not meet all LUO development standards, the Petitioner will have to obtain a waiver approval from the DPP.

- E. Environmental Impact Statement. The DOE determined the proposed improvements are exempt from the requirement to prepare an Environmental Assessment, set forth in Chapter 343, HRS, Environmental Impact Statements, and HAR, Title 11, State of Hawaii, Department of Health (DOH), Chapter 200.1, Environmental Impact Statement Rules. The exemptions are set forth in the "Exemption List for the Office of Business Services of the Department of Education, State of Hawaii, Reviewed and Concurred Upon by the Environmental Council on November 8, 2006." Appendix A, in the SUP application, shows the DOE Exemption List.

## II. FINDINGS OF FACT

- A. Site Description and Surrounding Uses. The Petition Area is located in Olomana, about 0.3 miles south of Kalanianaʻole Highway, and approximately 0.8 miles southeast of the intersection of Kalanianaʻole with Kailua Road. The Petition Area comprises approximately 2.516 acres of a portion of TMK 4-2-006: 002.

The Petition Area is divided into two separate areas: The school campus, and; the overflow and event parking area. The two areas are separated by Road "A." The lower overflow and event parking areas comprises approximately 0.310 acres. The school campus, measuring approximately 2.206 acres, contains all of the existing and proposed buildings and uses covered in the SUP application.

The school campus is also divided into two areas: The upper campus and; the lower campus. The upper campus lies to the south and contains a majority of the classroom buildings and administrative facilities, the library, the Counselor's building, the Culinary Arts and Cafeteria building, and the restrooms. The lower campus, located in the north, is comprised of the main parking area, most of the specialty facilities (Wood Shop, Auto Mechanics Area, Technology Center, Work Shop, Greenhouse/Agricultural Facility, Teen Care Trailer), and various storage containers.

According to the application, the topography of the Petition Area and surrounding area is generally flat and generally slopes from south to north; from 252 feet above mean sea level (MSL) to 230 feet above MSL. The topography of the remainder of the property outside of the Petition Area is varied. The southern-most point of the property is the peak of Olomana extending to approximately 1,840 feet MSL. The area around Olomana peak is defined by steep, vegetated slopes. The lowest point of the property is near the western-most property boundary, at approximately 120 feet MSL. The HYCF is located on lands that generally gently slope to the north, toward Kalanianaʻole Highway.

Access to the Petition Area is via Road "A", which connects to Kalanianaʻole Highway. Approximately 800 feet along Road "A" from Kalanianaʻole Highway is a connecting road to the HYCF. There is another entrance to HYCF off of Kalanianaʻole Highway approximately 800 feet west of the Road "A" driveway entrance.

- B. Climate and Wind Patterns. As of 2014, the "Climate of Hawaii," Department of Geography, University of Hawaii database, indicates that the Petition Area has an average mean annual temperature of about 70.0 to 77.1 degrees Fahrenheit. The

average annual rainfall is approximately 3.8 inches and an average annual wind speed of about 5.8 miles per hour.

C. Soil Type and Quality of Agricultural Land.

1. U. S. Department of Agriculture (DOA). According to the U.S. DOA, Soil Conservation Service, the predominant soil types within the Petition Area include Pohakupu silty clay loam, 0 to 8 percent slopes (PkB), and Pohakupu silty clay loam, 8 to 15 percent slopes (PkC). Pohakupu silty clay loam soils are well-drained soils with slow to medium runoff and moderately rapid permeability. These soils are used for pasture, truck crops, and urban development.
2. Agricultural Lands of Importance to the State of Hawaii (ALISH). The ALISH Map, prepared by the State DOA, classify lands into three categories: 1) Prime Agricultural Land; 2) Unique Agricultural Land; and 3) Other Important Agricultural Land. According to the ALISH Map, the Petition Area does not contain any designated areas.
3. Land Study Bureau (LSB) Classification. According to the LSB overall master productivity rating system, the Petition Area is comprised of Class D soils (Exhibit 5). The LSB rating system is based on the agricultural productivity of soils throughout the State, accounting for characteristics such as texture, slope, salinity, erodibility, and rainfall. The productivity ratings are used to designate each area as Class A, B, C, D, or E. Class A represents the most productive soils and Class E represents the least productive soils.
4. Important Agricultural Lands (IAL). Article XI, Section 3 of the State Constitution sets out the framework for state policies and all subsequent legislation related to IAL. Each county is mandated – through its planning department – to identify lands within its jurisdiction that have potential for IAL designation and to prepare draft maps of their recommendations for LUC approval. The City approved the IAL maps (Resolution No. 18-233, CD1, FD1) in 2019 and forwarded them to the LUC for adoption.

Chapter 205-44.5, HRS identifies a separate process under which public lands, as defined under Chapter 171-2, HRS, are to be identified for IAL designation. The Petition Area, as State-owned and considered public lands under this definition, have not been designated as IAL since the State has not completed the designation process.

- D. Agency Comments. The DPP submitted a request for comment from the following government agencies on August 10, 2020. Agencies stating they have “no comments,” “no objections,” or “no impacts on services provided” are identified with an asterisk (\*) below. Agencies that provided substantive comments to the SUP are identified with a plus sign (+) below and are listed in Table 2, alongside a summary of their comments. Agencies that were sent a request for comment include the following:

1. City Agencies:  
Department of Budget and Fiscal Services  
Department of Community Services\*  
Department of Customer Services

Department of Design and Construction\*  
 Department of Emergency Management (DEM)  
 Department of Environmental Services (ENV)\*  
 Department of Facility Maintenance\*  
 Honolulu Board of Water Supply (BWS)+  
 Honolulu Fire Department (HFD)+  
 Honolulu Police Department (HPD)

2. State Agencies:

Department of Land and Natural Resources (DLNR)\*  
     Division of Forestry and Wildlife+  
     Engineering Division+  
     State Historic Preservation Division (SHPD)  
 Department of Transportation (DOT)\*  
 DOH – Wastewater Branch\*  
 Office of Hawaiian Affairs  
 Office of Planning (OP)+

3. Federal Agencies:

U.S. Coast Guard Civil Engineering Unit

**Table 2 – Summary of Substantive Agency Comments**

Source	Comments Summary
BWS	The water system is adequate to accommodate the proposed improvements. Water conservation measures are required for proposed developments. The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements.
HFD	Adequate access needs to be provided for the fire department. Water supply needs to be adequate for fire protection. Unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. Civil drawings shall be submitted to HFD for review and approval.
DLNR – Division of Forestry & Wildlife	Minimize plant and soil movement. Consult with Oahu Invasive Species Committee. The Hawaiian Hoary Bat has the potential to occur in the Petition Area. Artificial lighting can adversely impact seabirds; all lighting should be fully shielded with nighttime construction avoided during fledging season.
DLNR – Engineering Division	Use of 44CFR reflects the minimum standards as set forth by the National Flood Insurance Program. The owner is responsible to research the Flood Hazard Zone designation for the proposed improvements. The Petitioner should include water demands and infrastructure required to meet project needs.
OP	OP recommends that the SHPD be contacted immediately in order to provide comments and approval on the Archeological Reconnaissance Survey. OP is also concerned that the application does not contain information and/or a determination that the proposed use of land is pursued in a culturally appropriate way since a Ka Paakai analysis was not conducted.



No other comments or concerns were received from the public. All written responses received prior to the signing of this report are included in their entirety in Attachment 1. Comments received after the signing of this report will be transmitted separately to the Planning Commission (PC).

- E. Community Concerns. The DPP requested that the Petitioner make a presentation to the Kailua Neighborhood Board No. 31 (NB 31). However, the Petitioner did not attend a Kailua NB 31 meeting to give a presentation of the Petition. Copies of the SUP were transmitted to the Kailua NB 31 on August 10, 2020. As of the date of this report, the DPP has not received comments from the Kailua NB 31.

### III. ANALYSIS

#### A. Laws and Public Policies.

1. Land Use Law, Chapter 205, HRS. The Petition Area is within the State Land Use Agricultural District (Exhibit 3).

Section 205-6, HRS, allows the county planning commission to permit certain unusual and reasonable uses within the agricultural and rural districts other than those for which the district is classified. The county planning commission may, under such protective restrictions as may be deemed necessary, permit the desired use, but only when the use would promote the effectiveness and objectives of this chapter.

In determining whether a proposed use is deemed “unusual and reasonable,” Section 2-45, of the PC Rules, established five guidelines. These guidelines are also found in Title 15-15, of the HAR for the State LUC.

The DPP finds that the proposal to allow the existing school uses to continue, and to add and expand school facilities on lands in the State Agricultural District, generally meet the requirements of Chapter 205, HRS. A description of the SUP’s comparison with the five guidelines of Section 2-45, of the PC Rules, are as follows:

- a. Guideline 1: Such use shall not be contrary to the objectives sought to be accomplished by the State Land Use Law and Regulations.

Chapter 205, HRS, seeks to protect agricultural lands and ensure their continued availability for agricultural use. It provides that the State Land Use Agricultural District shall also include lands with a high capacity for agricultural production, grazing, and other agricultural uses. Section 205-2 (a) (3), HRS, states that “In the establishment of the boundaries of agricultural districts the greatest possible protection shall be given to those lands with a high capacity for intensive cultivation.” Chapter 205, HRS, also recognizes that some lands in the State Land Use Agricultural District may be better suited for non-agricultural uses, solar energy facilities, and other renewal energy facilities.

Under Chapter 205-4.5, HRS, educational facilities are not a permitted use in the State Land Use Agricultural District. However, the use of the site for educational uses has had a long history dating back to when the Girl's Industrial School began in 1924. The establishment of the Olomana School/Olomana Youth Center on the site occurred in 1950. Both of these educational facilities pre-date the adoption of the State Land Use classifications and continue to this day as legal non-conforming uses.

The granting of a SUP for the Olomana School/Olomana Youth Center campus would formally change its status from a non-conforming use in the Agricultural District to a permitted one. Granting the SUP is not contrary to the objectives sought by the State Land Use Law because the lands involved with this Petition have historically not been cultivated and are not on soils conducive to high capacity production (LSB rated D as poor soils).

Being physically distant from the nearest Urban District means that a reclassification of the Petition Area to the Urban District would be difficult unless the in-between lands were included in the Petition Area. Reclassifying them to the State Land Use Urban District unnecessarily removes lands outside the Petition Area from agricultural designation. Creating small State Land Use Urban District "islands" or "spots" within large State Land Use Agricultural Districts is also problematic. Whereas, a SUP allows the land to remain designated as agriculture, permits this longstanding use on the property, and thus is not contrary to the objectives sought by the State Land Use Law and Regulations.

Moreover, a State Land Use Urban District Boundary Amendment may result in a permanent and dramatic change in use, form, and character of the land. If granted an Urban District designation, the Petitioner or future owners could seek to intensify the campus in a way that is not consistent with the open space character of the area. An amendment to the Koolau Poko Sustainable Communities Plan (KPSCP) to expand the Community Growth Boundary (CGB) to incorporate a new State Land Use Urban District for the Petition Area is not contemplated at this time. The SUP would continue to retain the Petition Area in the State Land Use Agricultural District while resolving the school's nonconformity status and allowing improvements and modernization while continuing to support the KPSCP's preservation and institutional policies for the area.

One of the proposed improvements included in the SUP are alterations to the P-1/P-2 serving kitchen and dining room. These proposed improvements are unique as the facility has been specifically designed as a "Food Lab" to support the DOE's State-wide Aina Pono Farm-to-Table program. This facility will teach students how to use and cook local items grown in the School's existing greenhouse and agriculture area. The permitting of this modification directly supports greater agricultural production, as well as teaching students how to use unique, locally-grown produce.

A SUP is considered the better option of bringing into compliance the existing non-conforming use of the school and allows the Petitioner to expand the school facility while adhering to Guideline 1 as set forth in the PC rules.

- b. Guideline 2: The desired use would not adversely affect surrounding property.

The nearest use not associated with the Olomana School/Olomana Youth Center campus is the HYCF, located on the same TMK. The gymnasium of the HYCF is approximately 300 feet northeast of the Petition Area. The main facility of the HYCF is approximately 1,000 feet northwest of the Petition Area. The Women's Community Correctional Center (WCCC) is located north of Kalaniana'ole Highway and not visible from the Petition Area. Approximately 1,800 feet to the west of the Petition Area, beyond the HYCF, is the Olomana residential subdivision consisting of single-family dwellings. To the southwest, is the Maunawili Subdivision. From both subdivisions, the Petition Area is obscured by undulating topography and thick vegetation.

Construction Noise. Construction and operational noise is not anticipated to impact residents of the Olomana Subdivision. Noise generated by construction or operational vehicles will be of short duration given the construction and use of modular classrooms. Therefore, a condition of SUP approval to address construction noise is not recommended.

Operational Noise. There are no proposed changes to the Wood Shop or Auto Mechanics Area. Operational noise from the proposed improvements is not anticipated to adversely affect surrounding properties or exceed the existing noise levels from current operations of the nearby Wood Shop or Auto Mechanics Area. The SUP application stated the campus only holds three night events a year and does not have sporting events. The Petitioner is required to comply with the DOH noise regulations. Therefore, a condition of SUP approval to address operational noise is not recommended.

Drainage. There are no City drainage systems in the Petition Area. The Petition Area's existing drainage patterns direct surface runoff to an undeveloped area on the northern edge of campus. Of the water that does not infiltrate, runoff is anticipated to flow into natural drainage channels further north. While the differential run-off calculations were not provided in the SUP application, the additional run-off from a half-acre of additional impervious surfaces from the proposed parking area expansion and additional modular trailers is expected to be low and should infiltrate across the surface of the larger property. The only grading and excavation proposed in the SUP application is for the footings of the proposed modular trailer classrooms.

The Petition Area and surrounding lands are classified as Zone "D" by the Flood Insurance Rate Map (Exhibit 7), which means the flood potential for the Petition Area and the surrounding area is undetermined. The

Petitioner is required to comply with the prevailing soil erosion and stormwater quality standards ("Rules Relating to Water Quality") of the City and County of Honolulu. Compliance with the Rules Relating to Water Quality will be verified at the time that grading or construction plans are submitted to the DPP for review for the proposed improvements. Therefore, a condition of SUP approval to address drainage is not recommended.

Air Quality. Air quality in the area is not expected to be affected, as a result of the proposed improvements. The Petitioner is required to comply with the DOH air quality regulations. There may be brief, short-term impacts to air quality associated with construction activities generating minimal dust and vehicle exhausts. Overall, however, impacts to air quality associated with construction are anticipated to be limited, as the proposed buildings are modular and will likely not involve significant ground disturbance, and will cease upon completion of construction. Therefore, a condition of SUP approval addressing air quality is not recommended.

Open Space. The Property's existing scrub and forest lands and open space, located adjacent to the Petition Area, will continue to be undeveloped. Continued use of the Petition Area for a school will not adversely impact the open space quality between the Petition Area and surrounding uses. Therefore, a condition of SUP approval to address the number of visitors on site is not recommended at this time.

Public Views. The Petition Area is well screened by existing trees and shrubs and the surrounding topography. The existing and proposed buildings are single-story structures. Tall trees on-site and around the Petition Area screen much of the buildings from public views, particularly important views identified in KPSCP, Map A-1: Open Space, looking mauka along Kalanianaʻole Highway. Therefore, a condition of SUP approval relating to screening of the existing school or proposed improvements from public views is not recommended at this time.

- c. Guideline 3: Such use would not unreasonably burden public agencies to provide roads and streets, sewers, water, drainage and school improvements, and police and fire protection.

The continued use of the school and proposed intensification will not unreasonably burden public agencies to provide roads, sewers, drainage, schools, police, and fire protection based on the following:

Roads and Streets. Access to the Petition Area is via a private access road known as Road "A," with ingress/egress off of Kalanianaʻole Highway, a State road. Road "A" connects to Kalanianaʻole Highway at an unsignalized intersection. There are dedicated turn lanes into Road "A" going both directions. Kalanianaʻole Highway has two through lanes in each direction, not including the turn lanes. There is also a left turn lane for east-bound traffic toward the WCCC.

There is a crosswalk traversing Kalanianaʻole Highway on the eastern side of the intersection. A flashing sign with a 25 miles per hour (mph) posted speed limit during school times alerts drivers of the crossing 500 feet prior to the crosswalk for east-bound traffic, and 175 feet for west-bound traffic. The remainder of the time, the posted speed limit is 45 mph.

The Petitioner estimates approximately 80 percent of students commute to school on the City bus. Bus routes 69, 87, and 89, that traverse in both directions, serve both students and staff. The bus stops for both east-bound and west-bound routes are located approximately 220 feet west of Road "A."

A traffic study was performed in 2018 for the Final Environmental Impact Statement for the WCCC. According to the SUP application, the traffic study calculated the Level of Service (LOS) of the westbound left-turn lane onto Road "A" to be operating at LOS "A" during both A.M. and P.M. peak periods. In the eastbound right-turn lane into Road "A," 17 vehicles were observed during the A.M. peak period and two vehicles observed in the P.M. peak period. At both A.M. and P.M. peak periods, the right-turn lane was operating at a LOS "C." The traffic conditions and existing LOS at the intersection are anticipated to remain similar.

The State DOT stated they do not anticipate that the proposed improvements will significantly impact State highways. Therefore, a condition of SUP approval relating to traffic impacts is not recommended at this time.

Sewers. The Petitioner proposes a new restroom facility for the students, and to rehabilitate the cafeteria into a culinary arts center. These facilities are proposed to be connected to the existing gravity sewer collection system that serves the various school buildings. The collection system gravity flows to a sewer pump station located north of the school, which then connects to a force main. The force main flows to the City sewer system along the Kalanianaʻole Highway. The Petitioner stated the anticipated demand from the proposed improvements and an increase in enrollment of 90 students would potentially increase wastewater generated by 860 gallons per day. The Petitioner stated this increase would not burden the City's wastewater collection, treatment, and disposal systems. The ENV had no comments or objections to the SUP. The DPP, Wastewater Branch stated no objections, adding that any buildings with plumbing facilities should connect to the wastewater system. Therefore, a condition of SUP approval addressing wastewater is not recommended.

Water. The BWS stated that the existing water system is adequate to accommodate the proposed improvements. However, the BWS reserves the right to change this position up until final approval of the building permit application. Therefore, a condition of SUP approval relating to water service and fire protection is not recommended at this time.

Drainage. There are no City drainage systems at the Petition Area. The Petition Area's drainage patterns direct surface runoff to an undeveloped area on the northern edge of campus. Of the water that does not infiltrate, runoff would potentially flow into natural drainage channels further north. The proposed improvements of the parking area and modular trailers could slightly increase stormwater runoff leaving the Petition Area. However, this would likely not result in a significant increase of runoff as the proposed impervious surfaces, as represented in Exhibit 2, is less than half of an acre, and the surrounding property, a vast majority which is in open space, is large enough to accommodate for the potential increase in runoff containing the runoff within the larger property. The Petition Area and surrounding lands are classified as Zone "D" by the Flood Insurance Rate Map, which means the flood potential for the Petition Area and the surrounding area is undetermined. The Petitioner is required to comply with the City and County of Honolulu's Rules Relating to Water Quality. Therefore, a condition of SUP approval to address drainage is not recommended at this time.

School Improvements. The purpose of the SUP is to recognize the non-conforming use of the existing school, and to improve school facilities. The proposed improvements will assist in meeting the demand for school facilities and services. Therefore, a condition of SUP approval to address school improvements is not recommended.

Police Protection. The Petition Area is located about two miles to the north in Police District 4, Kailua Substation. According to the Petitioner, the proposed improvements will not require additional police services. The HPD did not respond to the request for comment. A condition of SUP approval relating to police service is not recommended.

Fire Protection. The nearest fire station is Olomana Fire Station No. 39, located along Kalanianaʻole Highway, approximately 750 feet west of the intersection with Road "A" and Kalanianaʻole Highway approximately 1,800 feet from the Petition Area. According to the Petitioner, fire protection to the Petition Area is provided by an existing 8-inch water line located along the access road to the lower campus. This 8-inch water line connects to a manhole located on the access road just outside of the School gate. A fire hydrant will be constructed near the new restroom facility as part of the modular classroom project.

The HFD provided standard comments with respect to the provision of access roads and clearances, water supply and hydrant location, and continued review of the proposed improvements. Building permits for new buildings or renovations would be circulated to the HFD for review. Any firefighting infrastructure required by the HFD may be imposed at that time. Commercial cooking facilities are required to meet current building and fire suppression requirements. A new fire hydrant, with enough space for a fire truck to turn around, will be provided near the new modular classroom. Therefore, a condition of SUP approval relating to fire protection is not recommended.

Emergency medical services are provided by the City's Emergency Medical Services with the nearest hospital, Castle Medical Center, located less than one mile west of the Petition Area.

The planned improvements will be designed to meet fire and building code and safety requirements.

- d. Guideline 4: Unusual conditions, trends, and needs have arisen since the district boundaries and regulations were established.

The long-term establishment of the site for educational facilities precedes the regulations that made it non-conforming. Due to this and the siting of other institutional uses on State lands nearby, such as the HYCF and the WCCC, the DPP's long-range land use plan, the KPSCP formally recognizes this area as an established area for future institutional uses.

- e. Guideline 5: The land upon which the proposed use is sought is unsuited for the uses permitted within the district.

The Petition Area is rated by the LSB as "D" generally considered as poor quality soils. Surrounding lands are open pasture or forested open space. Poor quality soils may be unsuited for the cultivation of crops but suitable for the raising of livestock. Also, some uses permitted in the State Agricultural District, such as solar energy facilities or wind energy facilities, are not directly tied to the production and conduct of agricultural activities. These uses and those involved in agricultural activities (active cultivation of crops, game or fish propagation, and the raising of livestock) or indirectly in agricultural activities (agricultural tourism and parks, and biofuel processing facilities) would likely be unwelcomed and resisted by the surrounding neighbors such as the Olomana and Maunawili residential subdivisions and the nearby Pohakupu Subdivision and Enchanted Lake/Keolu residential areas.

While the purpose of the SUP is to permit "unusual and reasonable" uses not typically permitted in the State Agricultural District, the Petitioner's educational programs, for which the SUP is being sought, support on-site agricultural activities. On-site farming activities, including the school greenhouses, supply agricultural products for the culinary arts educational programs. In addition, the undeveloped lands surrounding the Petition Area could support additional farming activities to provide more agricultural products for the Petitioner's culinary arts program, should it be needed. If the school were to expand farming activities outside of the Petition Area, no change to the SUP would be required as farming is a permitted use in the State Land Use Agricultural District.

- 2. PC Rule No. 2-46(e) – Establishment of the Proposed Use. Pursuant to PC Rule No. 2-46(e), a condition of SUP approval is to require a reasonable time limit to establish the use. As the proposed use is already established, this condition is not applicable.

3. Hawaii State Plan. The Hawaii State Plan (Hawaii State Planning Act, Chapter 226, HRS, as amended) provides the overall theme, goals, objectives, policies, and priority guidelines for Statewide planning. The continued use of the school and proposed improvements are consistent with the following objectives and policies of the Hawaii State Plan, as represented in the relevant HRS policies and guidelines listed below:

Section 226-21: Objective and policies for socio-cultural advancement – education.

- (a) Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.
- (b) To achieve the education objective, it shall be the policy of this State to:
  - (1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups;
  - (2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs;
  - (3) Provide appropriate educational opportunities for groups with special needs;
  - (4) Promote educational programs which enhance understanding of Hawaii's cultural heritage;
  - (7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.
  - (8) Emphasize quality educational programs in Hawaii's institutions to promote academic excellence.

Section 226-107: Quality education. Priority guidelines to promote quality education:

- (1) Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement;
- (9) Strengthen and expand educational programs and services for students with special needs.

The proposal supports the above objectives and policies by continuing to permit the use of existing and proposed school facilities that feature classes for various trades (i.e., carpentry, automotive, arts/graphics, culinary) and for remedial courses to bridge the gap of learning for other students.



4. Oahu General Plan – 1992, Amended in 2002 (GP). The GP consists of comprehensive objectives and policies that outline the City and County of Honolulu's long-range development goals. Although the Petitioner did not address the objectives and policies of the GP in the SUP application, the proposed continued use of the school and proposed improvements conform to the following objectives and policies of the Oahu's GP, as cited below:

Section IX. Health and Education

Objective B To provide a wide range of educational opportunities for the people of Oahu.

Policy 1 Support education programs that encourage the development of employable skills.

Policy 4 Encourage the construction of school facilities that are designed for flexibility and high levels of use.

Policy 5 Facilitate the appropriate location of learning institutions from the preschool through the university levels

The continued use of the school and proposed improvements would contribute toward the City's goals for education, providing diverse opportunities in alternative learning subjects and environments; retaining use of a site that has been used for education for almost 100 years.

5. KPSCP – 2017.

- a. CGB. The Petition Area is located outside of the KPSCP's CGB. According to Section 2.1.7, the CGB was established to define, protect, and contain the intended extent of urbanized or "built up" areas within those districts designated as "urban fringe" and "rural" by the GP. The purpose is to accommodate modest increases in population and development for uses needed to support established communities while protecting such communities from more intense forms of development, and to preserve lands outside the boundary for agriculture or other natural and open space resources.

While the Petition Area is outside the CGB, it is classified as an institutional use on the Map A-2: KPSCP Land Use Map and a preservation area on the KPSCP Map A-1: Open Space Map. From these two maps, it is clear that the established educational facilities are recognized as institutional uses and the property is intended to retain its open space character. Therefore, to grant the SUP would conform to the KPSCP principles and retain its State Land Use classification. A discussion regarding the consistency of the SUP with institutional uses follows in the next section.

Should the SUP be denied, the Olomana School/Olomana Youth Center would continue, but not be allowed to expand (permits may still be

needed to protect the health and safety for the occupants of the building) which, over time, may deter the continuation of educational services on the site, as the needs of the school grow or change. The cessation of educational uses on the property, while retaining its State Land Use Agricultural District designation, could see the elimination of a non-conforming use and the land having the potential to revert to agricultural uses.

- b. Institutional Uses. The Petition Area is located within the Institutional Area of the KPSCP Land Use Map. The Institutional Area is intended to include lands containing existing campuses, corporation yards in the Mount Olomana and Pohakupu neighborhood, correctional and detention facilities, and others. Granting the SUP for the existing school facilities, and the proposed improvements and additions, is consistent with, and promotes the policies and objectives, of the Institutional Area of the KPSCP.

Section 3.7.2 of the KPSCP addresses the design of institutional facilities as follows:

- Reflect in the site plan a campus-like environment with relatively low building coverage ratio and low profile, emphasize open space and landscaping.
- Vary the architectural character, depending on theme and purpose of the use. Design portions of buildings that are adjacent to or readily visible from residential areas to reflect that residential character or be screened from view from such areas by landscaping.
- Limit building heights to two to three stories or 40 feet, including the roof form. Provide height setback transitions from street frontages, the shoreline, and adjacent residential areas.

The above guidelines encourage the design of the proposed improvements to better blend with the immediately surrounding forested areas, and open space environment further out. These guidelines are reflective in the existing campus, and the proposed improvements. The campus buildings are single-story, modular structures, set back roughly 1,500 feet from Kalanianaʻole Highway. These guidelines are better met through the SUP process than to have the Petitioner seek a State Land Use District Boundary Amendment.

- c. Scenic Resources and Scenic Views. Kalanianaʻole Highway is identified on Map A-1: Open Space in the KPSCP as having significant continuous views of the Olomana peaks and Koolau Mountains. The Petition Area is immediately surrounded and screened by dense forest and topography. Current and proposed structures are not visible from the Kalanianaʻole Highway and will not interfere with the identified views. Outside of the Petition Area and surrounding vegetated areas, toward Kalanianaʻole Highway, the area features open space and pasture lands. The Petitioner will not disturb areas of the property outside of the Petition Area which will

retain the open, natural scenic environment pursuant to the policies of the KPSCP, Section 3.1.1. Therefore, a condition of SUP approval addressing public views is not recommended.

- d. Outdoor Lighting (KPSCP Guidelines). The KPSCP open space preservation guidelines allow outdoor lighting at the minimum level necessary for public safety, security, and community aesthetics consistent with the goals of energy conservation and environmental protection. They also encourage efforts to minimize glare and stray light. The SUP application states that the only outdoor lighting that exists on-site is at the entry doors of classroom and other school buildings, mounted under the roof overhang, and downcast.

The KPSCP guidelines for wetlands, wildlife preserves, and nature parks support minimizing artificial lighting on wildlife and human health by balancing the need for outdoor lighting for night utility, security, and desire for a reasonable architectural expression with the need to conserve energy and protect the natural environment. The DLNR – Division of Forestry & Wildlife, expressed concerns regarding outdoor lighting and the potential impacts to seabirds. The area immediately surrounding the Petition Area is forested. As such, outdoor lighting typical of an urban setting is not found within the Petition Area. Therefore, a condition of SUP approval is recommended that all new outdoor light fixtures, and all existing ones in need of replacement, including those above entry doors of the new buildings, shall be fully shielded and downcast with the level of lighting in lumens that is appropriate for its intended use.

- e. School and Library Facilities. According to Table 4.2 of the KPSCP, Olomana School/Olomana Youth Center previously had a capacity of 189 students in 2008-2009, although enrollment was much lower. Section 4.7.1 of the KPSCP provides the following policy for the consideration of schools:

- Consider schools as community resources for learning about specialized environmental, cultural and historic subjects related to Koolau Poko and each of its communities.

Section 4.7.2 of the KPSCP states the following:

- Apply the guidelines for institutions in Section 3.7.2 when a new public or private school campus or a significant increase in enrollment capacity at one of the existing campuses is proposed.

Guidelines pertaining to Section 3.7.2 of the KPSCP were already addressed above. Furthermore, an increase in capacity from 189 in 2008-2009, to 200 is not a significant increase.

6. ROH, Chapter 21, LUO. The Petition Area is located within the AG-2 General Agricultural District. According to the LUO, the intent of the AG-2 general agricultural district is to conserve and protect agricultural activities on smaller parcels of land. Pursuant to Table 21-3, Master Use Table, of the LUO, public

uses and structures are permitted in AG-2 district areas. Public uses and structures includes structures owned or managed by the State of Hawaii to fulfill a governmental function, activity or service for public benefit and in accordance with public policy. Typical public uses and structures include public schools. The continued use of the school and proposed improvements are consistent with the use and development standards specified in the LUO.

7. Chapter 205A-21, HRS, Special Management Area (SMA). The Petition Area is located outside of the SMA and approximately two miles from the nearest shoreline in Kailua; therefore, a SMA Permit is not required.
8. Chapter 205A, HRS, Coastal Zone Management (CZM). All lands of the State, including the area extending seaward of the shoreline to the seaward limits of the State's jurisdiction, are included in the CZM Area.

The proposal is consistent with the CZM objectives and policies pursuant to Section 205A-2, HRS, as follows:

Section 205A-2(b) Objectives.

(2) Historic resources;

- (A) Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

The Petition Area is located approximately two miles from the shoreline. The SUP will not affect the five buildings listed on the State Register of Historic Places. The five historic structures are located outside of the Petition Area. The alterations, improvements, and expansion proposed in the SUP are for school facilities that are compatible with the historic structures previously used for educational or supportive uses.

The proposed additions are located on the opposite side of campus from Moana Cottage, the nearest historic structure, which is partially collapsed. The gymnasium, the second closest historic structure, is mostly screened from the Petition Area by dense vegetation. The other three listed buildings are located more than 500 feet from the Petition Area.

(3) Scenic and open space resources;

- (A) Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

The Petition Area is located approximately two miles from the shoreline. The use of single-story modular buildings, appropriately screened from surrounding area, is supportive of protecting the area's scenic and open space resources.

(5) Economic uses;

- (A) Provide public or private facilities and improvements important to the State's economy in suitable locations.

The Petition Area has been used for educational facilities since the 1920s and for Olomana School/Olomana Youth Center since the 1950s.

Section 205A-2(c) Policies.

(2) Historic resources;

- (A) Identify and analyze significant archaeological resources;

The Petition Area has been used for educational facilities since the 1920s and for Olomana School/Olomana Youth Center since the 1950s. The SUP will not affect the five buildings on the State Register of Historic Places, which are located outside of the Petition Areas. The use of modular buildings minimizes ground disturbance.

- (C) Support state goals for protection, restoration, interpretation, and display of historic resources;

The 2.516-acre Petition Area has been used for educational uses for almost 100 years. The proposed improvements would not obstruct access on the property any more than the existing campus.

The OP expressed concern that the application does not contain information and/or a determination that the proposed use of land is pursued in a culturally appropriate way since a Ka Paakai analysis was not conducted. The OP added that further consultation with the SHPD should occur and that the SHPD should provide comments and approval on an archaeological report. According to the SUP application, the Petitioner will submit a Form 6E to the SHPD seeking concurrence that there are no historic properties affected by the continued use of the school and proposed improvements and that the SUP does not trigger the need for a Ka Paakai analysis. Therefore, a condition of SUP approval regarding historic resources and SHPD approval is recommended.

The SHPD was sent a request for comment from the DPP on this SUP application. As of the writing of this report, a response from the SHPD has not been received. Late comments from the SHPD will be transmitted to the PC if they are received prior to the SUP public hearing. State law already provides guidance on how historic resources are to be protected if they are inadvertently discovered during site work.

Section 205A-3(b) Policies.

(3) Scenic and open space resources;

- (B) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- (C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- (D) Encourage those developments that are not coastal dependent to locate in inland areas;

The Petition Area is located approximately two miles from the shoreline. The proposed uses are limited to Petition Area, which is already developed for educational uses. These uses are screened by vegetation and will not adversely impact open space and scenic resources.

(8) Public participation;

- (C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts;

The Petitioner failed to reach out to the Kailua NB No. 31 when prompted. However, the Petition Area is located approximately two miles from the shoreline, and therefore impacts to the coastal zone area are not anticipated. The DPP informed interested parties and area organizations, including the Kailua NB No. 31, of the SUP application and requested comments. In addition, the SUP application is available online at the DPP's webpage.

Based on the above analysis, the Director finds that the continued use of the school and proposed improvements are in compliance with relevant objectives and policies of the CZM Program.

9. Archaeological Impacts. Other than the nearby buildings that are 50 years old or older, there are no known historic resources in the Petition Area. The continued use of the school will not adversely impact archaeological resources. As the proposed improvements consist of alterations to existing structures, installation of ramps, and three new modular trailer classrooms, minimal ground disturbance is anticipated. State law already provides guidance on how archaeological resources are to be protected if they inadvertently discovered during site work. As previously stated, the SHPD did not submit comments as of the date of this Report. Therefore, a condition of SUP approval regarding historic resources and SHPD approval is recommended.
10. Social Impacts. The SUP will have minimal impact on population increases or decreases in the area and minimal adverse impact, if any, on the surrounding uses; i.e., the HYCF. Positive impacts of the SUP include increased stability of the management of the school facilities within the Petition Area, a potential increase in student capacity, and an increase in needed educational programs in the Petition Area.

11. Emergency Evacuation. The DEM did not comment on the SUP application. The Petition Area, is in the Federal Emergency Management Agency Flood Zone D, of undetermined flood zone risk, and is outside of the extreme tsunami evacuation zone area. No adverse impacts to emergency evacuation is anticipated as a result of the SUP application.

#### IV. CONCLUSION

The proposal addresses the goals of the Hawaii State Plan, and the City's GP and KPSCP, and meets the five guidelines established by the PC, pursuant to Section 2-45 of the PC Rules. There are no anticipated adverse impacts to existing infrastructure systems as a result of the SUP, provided that the Petitioner adheres to the recommended conditions of approval.

#### V. RECOMMENDATION

The Director recommends that Special Use Permit (SUP) Application File No. 2020/SUP-1, for the continued use and expansion of education facilities within the State Land Use Agricultural District on approximately 2.516 acres, Tax Map Key 4-2-006: Portion of 002, as shown on Exhibit 1, be approved, subject to the conditions below:

1. The Petitioner shall submit a metes and bounds description of Petition Area to the Department of Planning and Permitting (DPP) for review and approval prior to the first building permit. The area of the metes and bounds description and survey map shall not exceed 2.516 acres and all uses of the school, not permitted in the Agricultural District, shall fall within the area described by the approved metes and bounds description and map.
2. Prior to building permit approval for new structures, the Petitioner will submit to the DPP, for review and approval, an outdoor lighting plan with catalog cuts showing exterior fixtures fully shielded and downcast and that the level of lighting in lumens is appropriate for its intended use.
3. If, during construction, any previously unidentified archaeological sites or remains (including but not limited to human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes) are encountered, the Applicant must stop work and contact the SHPD immediately. Work in the immediate area must be stopped until the SHPD is able to assess the impact and make further recommendations for mitigative activity.
4. On or before December 31 of each year that the SUP is in effect, the Petitioner or its successor will file an Annual Report to the DPP that demonstrates the Petitioner's compliance with conditions of the SUP.
5. Major modifications to: (1) The approved site plan; (2) Amendments to the conditions of approval; (3) Any increases in acreage of the Petition Area; or (4) Change in approved uses stated herein, will be subject to the review and approval of the PC. Minor modifications, including minor additions to accessory

uses and structures in the approved area, are subject to review and approval by the Director.

6. The Petitioner and/or landowner will notify the Director of:
  - a. Any change or transfer of licensee on the Petition Area;
  - b. Any change in uses on the Petition Area;
  - c. Termination of any uses on the Petition Area; and/or
  - d. Transfer in ownership of the Petition Area.

The PC, in consultation with the Director, will determine the disposition of this SUP, and the facilities permitted herein.

7. Enforcement of the conditions of the SUP will be pursuant to the Rules of the PC, including the issuance of an order to show cause as to the reason the SUP should not be revoked if the PC has reason to believe that there has been a failure to perform the conditions imposed herein.

Dated at Honolulu, Hawaii this 2nd day of December, 2020.

DEPARTMENT OF PLANNING AND PERMITTING  
CITY AND COUNTY OF HONOLULU  
STATE OF HAWAII

By

  
Kathy K. Sokugawa  
Acting Director

Attachments